

THE HONORABLE JOHN C. COUGHENOUR

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

IN RE VALVE ANTITRUST LITIGATION

Civil Action No. 2:21-cv-00563-JCC

DECLARATION OF CARA WALLACE
IN SUPPORT OF UNOPPOSED MOTION
TO KEEP MICROSOFT'S HIGHLY
CONFIDENTIAL – ATTORNEY'S EYES-
ONLY INFORMATION UNDER SEAL

I, Cara Wallace, declare the following:

1. I am an attorney at the law firm Perkins Coie LLP and counsel to Microsoft Corporation ("Microsoft"). I am a member in good standing of the State Bar of Washington. The facts stated in this declaration are based on my own personal knowledge and, if called as a witness, I could and would testify to those facts.

2. I submit this declaration in support of Microsoft's motion to keep its information sealed in the above-captioned litigation.

3. The highlighted portions of the Schwartz Reply, Dkt. 316-85, identified in the First Declaration of Aaron Greenberg, Dkt. 195, Ex. A, and Plaintiffs' *Daubert* Opposition, Dkt. 317, that is appended to the Third Declaration of Aaron Greenberg in Support of Unopposed Motion to

1 Keep Microsoft's Highly Confidential Attorney's Eyes-Only Information Under Seal contain
2 information that Microsoft designated as "Highly Confidential – Attorney's Eyes Only" during
3 discovery.

4 4. I telephonically met and conferred with Plaintiffs' and Valve's counsel to discuss
5 the information referenced in Paragraphs 3 above on July 30, 2024.

6 5. Plaintiffs and Valve told me that they do not oppose Microsoft's Unopposed
7 Motion to Keep Microsoft's Highly Confidential – Attorney's Eyes-Only Information Under Seal.

8 I declare under the penalty of perjury of the laws of the United States of America that the
9 foregoing is true and correct.

10 Executed this 5th day of August, 2024 in Seattle, Washington.

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13 /s/ Cara Wallace
14 Cara Wallace
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